

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

MICHAEL BRINKLEY

CAN NO 105:11 529

U.S. DISTRICT COURT  
DISTRICT OF MASS

2006 JUN -5 P 5:12

FILED  
IN CLERKS OFFICE

✓  
SUFFOLK COUNTY DISTRICT ATTORNEY'S OFFICE RE:  
ASSISTANT DISTRICT ATTORNEY'S  
LEORA C. JOSEPH KAREN E. POLLEY CHARLES J. BAROLINI

28USCA 2254

MOTION TO INDICT DEPUTY

COMES THE PETITIONER PRAYING FOR RELIEF  
FROM INVALID AND UNREASONABLE PROSECUTION.  
COMMONWEALTH PROSECUTORS MISCONDUCT DENIED AND  
DEPRIVED DEFENDANT OF THE RIGHT STATUTORY AND  
CONSTITUTIONAL, TO A FAIR AND IMPARTIAL JURY AND  
TRIAL. DEFENDANT IS UNLAWFULLY IMPRISONED  
WRONGFULLY CONVICTED ESPECIALLY IN LIGHT OF ADA  
LEORA C. JOSEPH'S ADMISSION OF GUILT CONCERNING  
FALSIFICATION AND FABRICATION OF MATERIAL EVIDENCE  
AT SENTENCE APPEAL HELD AT SUFFOLK SUPERIOR COURT  
MAY 3RD 2006 AND RECONFIRMED AT THE MAY 3RD 2006  
SITTING. THIS BLATANT MISREPRESENTATION AND  
DISREGARD OF ETHIC MORALS AND LEGAL OBLIGATION,  
IS IRREPARABLE. PETITIONER URGES AND JUSTICE  
DEMANDS INDICTMENT AND TRIAL BY JURY FOR THE ABOVE  
NAMED COMMONWEALTH PROSECUTORS.

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UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

MICHAEL BRINKLEY

CAN 105 11529

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SUFFOLK COUNTY DISTRICT ATTORNEY'S OFFICE

ADAS KAREN E. BOLLEY LEORAC, JOSEPH CHARLES A. BOYOLONI

28USCA 2254

MOTION TO INDICT PERJURY

RESPECTFULLY SUBMITTED

~~14877~~ ~~7/1/06~~ W87017 SSN# 018427265

5/27/06